

March 27, 2013

**PERMIAN ELECTRONICS, INC.**  
**929 SOUTH L STREET**  
**MIDLAND, TX 79701**  
**432-570-6677**

**Submitted on behalf of:**

**Hunt Oil Company**  
**200 N. Loraine Street**  
**Midland, TX 79701**  
**Callsign: WNDZ930**

**Office of the Secretary**  
**Marlene H. Dortch, Secretary**  
**Federal Communications Commission**  
**445 12<sup>th</sup> Street, S.W.**  
**Washington, D.C. 20554**

Re: Request for extension of existing three (3) month waiver granted on: January 1, 2013 of FCC Narrowbanding Requirement FCC WT Docket No. 99-87

Dear Madame Secretary:

Hunt Oil Co., pursuant to Section 1.925 of the Federal Communications Commission ("FCC") rules and Public Notice, DA 11-1189<sup>1</sup> is hereby requesting an extension of their existing waiver of FCC Rule Section 90.209(b)(5). Hunt Oil Co. requests a limited extension of two (2) months<sup>2</sup> to their existing April 1, 2013 waiver deadline pursuant to WT Docket No. 99-87<sup>3</sup>. In support of this waiver request, we are submitting/updating the following information.

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<sup>1</sup> Wireless Telecommunications Bureau, Public Safety and Homeland Security Bureau, and Office of Engineering and Technology Provide Reminder of January 1, 2013, Deadline for Transition to Narrowband Operations in the 150-174 MHz and 421-512 MHz Bands and Guidance for Submission of Requests for Waiver and Other Matters, *Public Notice*, DA 1101189, released July 13, 2011.

<sup>2</sup> To June 1, 2013.

<sup>3</sup> See Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, *Second Report and Order and Second Further Notice of Proposed Rulemaking*, WT Docket No. 99-87, RM-9332, 18 FCC Rcd 3034 (2003) ("Second R&O"); Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, *Third Memorandum Opinion and Order, Third Further Notice of Proposed Rule Making and Order*, WT Docket No. 99-87, RM-9332, 19 FCC Rcd 2-545 (2004) ("Third MO&O"); Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, *Order*, WT Docket No. 99-87, RM-9332, 25 FCC Rcd 8861 (2010) ("Narrowbanding Waiver Order").

### **Scope of Hunt Oil Company's Wireless Operations (System Size and Complexity)**

*Hunt Oil Co. reports no changes from the original waiver request under this heading. Hunt Oil Co. submitted the following on December 28, 2012:*

Hunt Oil Company's system consists of the following: 1- Repeater, 1- Fixed Base Station, 8- Mobiles, & 12 Mobile Voice Alarms. The radios and voice alarms are used to notify personnel of hazardous situations, monitor tank levels (oil & salt water), and produced natural gas. Since this system is in a rural area, it plays a critical roll in the protection of life and the environment. Due to terrain and the limited cellular infrastructure, these radios are the **only** means of communication to vital dispatch personnel. Without these radios in place, life threatening situations could arise with no means of communication. Furthermore, the environment could be at risk since many of the monitored locations reside on a watershed for the Brazos River.

### **Recent Initiatives**

*Hunt Oil Co. submitted the following on December 28, 2012:*

Hunt Oil Co. modified callsign WNDZ930 in May of 2010 to include a narrowband emission designator. In June of 2012, Hunt Oil Co. replaced the following, radio equipment with narrowband compliant devices: 1- Repeater, 1- Fixed Base Station, & 8- Mobiles. All that remained were the 12 Mobile Voice Alarms to meet the Jan 1, 2013 deadline. Afterwards, it was decided by Hunt Oil Co. to replace the 12, Mobile Voice Alarms with a more contemporary alarm system (this new system operates in the ISM band (FCC Part 15.247) of the spectrum). But, due to equipment delays and infrastructure build out issues, Hunt Oil Co. is currently unable to make the required Jan 1, 2013 deadline (please see Scope of Hunt Oil Company's Wireless Operations for the importance of this system). Without the replacement alarm system, no alarms will be present, and personnel, as well as the environment, could be at risk. Therefore, Hunt Oil Co. petitions the FCC for a three month extension. This extension will allow Hunt Oil Co. time to receive their equipment and complete the new infrastructure build out. During this time, our existing Voice Alarms could continue to protect life and the environment.

*March 27, 2013 Update: Hunt Oil Co. is actively replacing the Mobile Voice Alarms with new equipment. But, due to software & hardware issues with the new computerized alarm system, we will be unable to meet our April 1, 2013 waiver deadline.*

### **Implementation Strategy and Completion Dates**

*Hunt Oil Co. submitted the following on December 28, 2012:*

Hunt Oil Company's implementation approach involves replacing the 12, existing, Mobile Voice Alarms, with new ISM band (FCC Part 15.247) equipment. This encompasses construction of 2 small towers, and the installation of a new computerized alarm dispatch console. Hunt's plan involves replacing all 12 units by the end of February and the dispatch console by the end of March. As equipment is installed, the old, existing, Mobile Voice Alarms will be removed from the licensed 450MHz system. This will continue until all 12



units are phased out of operation. If Hunt's plan of action is accepted, all 12 Mobile Voice Alarms will be removed from the licensed 450MHz system before our proposed date of April 1, 2013. At which time, Hunt will be fully compliant with the narrowbanding mandate.

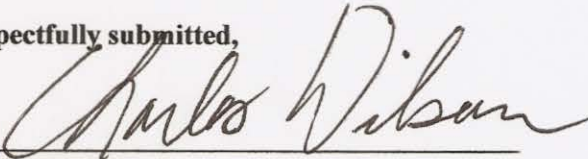
Considering the following plan to: 1) Remove the 12 Mobile Voice Alarms from Hunt Oil Company's current system 2) The efforts that have already been undertaken and those which are scheduled 3) The critical nature (risks to life & environment) of the current system, Hunt Oil Co. respectfully requests that the FCC act expeditiously to grant this waiver of the Commission's Rules and extend the narrowbanding deadline on Hunt Oil Company's callsign: WNDZ930 for three months.

March 27, 2013 Update: As stated above, our goals were: 1- Replace the 12, existing, Mobile Voice Alarms with new ISM band equipment. 2- Construct 2 small towers. 3- Install a computerized alarm dispatch console. The proposed completion dates were: 1- End of February for the 12 Mobile Voice Alarms, and, 2- computerized dispatch console by the end of March. In good effort, Hunt Oil Co. has completed the following: 1- Towers have new equipment in place and are fully functional. 2- All equipment is on hand ready for installation, and 5 of the 12 replacement radios are in place. 3- Computerized Alarm console is in place. Unfortunately, we have experienced software & hardware issues with our alarm dispatch console which has placed us behind on our radio completion dates. Since these delays were unforeseen, we humbly request an extension to our existing three (3) month waiver. We would like to extend our original waiver request by two (2) months to: June 1, 2013. This extension will give us the time we so desperately need to work out the bugs in our software & hardware and complete the 7 remaining installations. Please note, Hunt Oil Co. does not take this request lightly. We fully understand the importance of meeting deadlines and want to assure the FCC that we are doing our due diligence to complete this transition to a new system. Furthermore, we request that the FCC consider the nature of our system, with its extremely rural location and the criticality of its operation to both the environment and human life. Considering these aspects, Hunt Oil Co. respectfully requests that the FCC act expeditiously to grant Hunt Oil Co. a two (2) month waiver extension to our existing waiver which expires on: April 1, 2013.

**Permian Electronics, Inc.  
on behalf of Hunt Oil Co.**

**Respectfully submitted,**

**By:**

  
**Charles Wilson  
Wireless Supervisor  
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